

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JAKUB MADEJ,

Plaintiff,

vs.

SYNCHRONY FINANCIAL,

Defendants.

:
: Civil Action No.: 1:21-cv-01894-WFK-SJB
:

: **DECLARATION OF**
: **TAMARA KLING**
:
:

I, Tamara Kling, declare as follows:

1. I am authorized to execute this declaration as a Representation Services Advisor to CT Corporation (“CT”). This affidavit is based upon my review of the records created and maintained by CT in the ordinary course of business for the purpose of recording, imaging, processing, and forwarding documents delivered to CT in CT’s role as registered agent. If called as a witness to testify, I could and would competently testify to the facts set forth herein.
2. On April 27, 2021, CT received correspondence, later determined to be related to the above-captioned matter (the “Correspondence”). Upon review of the correspondence, CT determined that the correspondence was directed to Synchrony Financial.
3. CT is not the registered agent for Synchrony Financial for the State of New York.
4. On April 29, 2021, CT advised Plaintiff via correspondence (a true and correct copy of which is attached as **Exhibit A**) that “After checking our records and the records of the State of NY, it has been determined that C T Corporation System is not the registered agent for an entity by the name of Synchrony Financial.” CT was unable to forward.”

5. On May 6, 2021, CT received another piece of correspondence from the Plaintiff and advised Plaintiff via correspondence dated May 6, 2021 (a true and correct copy of which is attached as **Exhibit B**) that “Synchrony Financial is not listed on our records or on the records of the State of NY. CT was unable to forward.”

6. I have searched CT’s records and have found no record of CT receiving or forwarding any service of process materials related to this matter after sending the rejection letter to the plaintiff.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 23d day of June 2021, at Chicago, IL.



Tamara Kling